Case 3:24-cv-06058-TMC Document 40 Filed 03/13/25 Page 1 of 3 The Honorable Tiffany M. Cartwright UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT TACOMA MOZZY CLARK, No.: 3:24-CV-06058-TMC Plaintiff, STIPULATED DISMISSAL WITH PREJUDICE AND WITHOUT FEES v. OR COSTS AS TO DEFENDANT REGINA WILLIAMS, A/K/A REGINA STATE OF WASHINGTON, DEPARTMENT ESPERANZA AVELLAR ONLY OF CORRECTIONS; LT. DENNIS SIMONS; SGT. REGINA WILLIAMS A/K/A REGINA ESPERANZA AVELLAR; HEIDI WHITTEMORE; OFFICER THERESA AYOTTE; OFFICER MICHAEL BROOKS; and DOES 1-10. Defendants. COME NOW the parties, by and through their counsel of record, and hereby stipulate and agree pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii) that all claims against the Defendant, REGINA WILLIAMS a/k/a REGINA ESPERANZA AVELLAR, be dismissed with prejudice, and without fees or costs to either party. /// /// /// /// STIPULATED DISMISSAL WITH SIMMONS SWEENEY FREIMUND SMITH TARDIF PLLC PREJUDICE AND WITHOUT FEES OR OLYMPIA OFFICE BELLINGHAM OFFICE COSTS AS TO DEFENDANT REGINA 711 CAPITOL WAY S, STE 602 1223 COMMERCIAL ST WILLIAMS, A/K/A REGINA OLYMPIA, WA 98501 BELLINGHAM, WA 98225 ESPERANZA AVELLAR ONLY -TEL: (360) 534-9960 TEL: (360) 752-2000 No.: 3:24-CV-06058-TMC – Page 1 FAX: (360) 534-9959 FAX: (360) 656-5013

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1	DATED this 13th day of March, 2	2025.				
2	SIMMONS SWEENEY FREIMUND	ROBERT A. BOUVATTE, PLLC				
3	SMITH TARDIF, PLLC					
4	/s/ John R. Nicholson JOHN R. NICHOLSON, WSBA #30499	P.O. Box 14185 Tumwater, WA 98511				
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8	Department of Corrections, Lt. Dennis	igion, Timomey for Humani				
9	Simons, and Heidi Whittemore					
10	NICHOLAS W. BROWN Attorney General	THE PIVTORAK LAW FIRM				
11	/s/ Chad Everett Arceneaux	/s/ David Pivtorak				
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26	STIPULATED DISMISSAL WITH PREJUDICE AND WITHOUT FEES OR COSTS AS TO DEFENDANT REGINA WILLIAMS, A/K/A REGINA ESPERANZA AVELLAR ONLY –	SIMMONS SWEENEY FREIMUND SMITH TARDIF PLLC OLYMPIA OFFICE BELLINGHAM OFFICE 711 CAPITOL WAY S, STE 602 1223 COMMERCIAL ST OLYMPIA, WA 98501 BELLINGHAM, WA 98225 TEL: (360) 534-9960 TEL: (360) 752-2000				

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ESPERANZA AVELLAR ONLY –

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1	PROOF OF SERVICE						
2	I certify that on March 13, 2025 I electronically filed the foregoing with the Court through						
3	CM/ECF and served on all parties or their counsel of record a copy of this document addressed						
4	as follows:						
5	Robert Bouvatte CM/ECF-Filing ABC/Local Massacrass						
6	P.O. Box 14185 Tumwater, WA 98511 ABC/Legal Messenger Email						
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15	chad.arceneaux@atg.wa.gov						
16	dann.graf@atg.wa.gov john.unfred@atg.wa.gov						
	TORTacEF@atg.wa.gov Attorney for Defendants Theresa Ayotte						
17	and Michael Brooks						
18	I certify under penalty of perjury under the laws of the state of Washington that the						
19	foregoing is true and correct.						
20	DATED this 13th day of March, 2025 at Olympia, WA.						
21	DATED this 13th day of March, 2023 at Olympia, WA.						
22	/s/ Jenny Singleton						
23	Jenny Singleton, Paralegal						
24	711 Capitol Way S, Ste 602 Olympia, WA 98501						
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	Jenny Woodlan Group.com						
26	STIPULATED DISMISSAL WITH PREJUDICE AND WITHOUT FEES OR COSTS AS TO DEFEND ANT RECIDIA						

COSTS AS TO DEFENDANT REGINA WILLIAMS, A/K/A REGINA ESPERANZA AVELLAR ONLY -No.: 3:24-CV-06058-TMC - Page 3

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